

REMARKS

Claims 33, 35, 37 and 39 have been canceled.

Claims 1-32, 34, 36 and 38 stand rejected under 35 USC 103(a) on Friday (U.S. Patent No. 6,631,453) in view of Kenworthy (U.S. Patent No. 6,317,837). Applicants respectfully traverse this rejection, because the Examiner's combination of the references is improper, and furthermore, even if the combination of the references was proper, neither Friday nor Kenworthy, alone or in combination, discloses all of the features recited in the claims.

The Examiner asserts that a motivation exists to combine the references because the references are in the same field of endeavor. Applicants respectfully disagree. As stated at col. 2, lines 4-14, Friday discloses a system wherein firewalls are not used. The specification of Friday explains that firewalls are inadequate in modern computing to protect systems from external attacks, and Friday therefore teaches a system in which firewalls are not used, and in which non-firewall based hardware and firmware is used to protect the system. To the contrary, Kenworthy discloses an internal network node having a dedicated firewall. Accordingly, the cited references teach away from each other in that one states that firewalls should not be, and are not, used and the other teaches the use of a firewall. Consequently, the combination is improper and claims 1-32, 34, 36 and 38 are allowable.

Even if the combination of Friday and Kenworthy was proper (which it is not), claims 1-32, 34, 36 and 38 would still be allowable because the combination thereof fails to disclose or suggest all of the features recited in the claims.

Specifically, claim 1 recites a method comprising a "portable terminal establishing a connection with said image forming data transmission device via said second internal network, said second firewall, said external network, said first firewall and said first internal network using a protocol, which allows bi-directional connections between the internal network and the external

network at said first firewall and said second firewall.” These features are not disclosed by either Friday or Kenworthy.

Initially, it is noted that the cited art does not disclose or suggest the use of a portable terminal, such as the cell phone depicted in Figures 1 and 9 and described starting at paragraph [0037] of applicants’ specification. Instead, Friday discloses the transfer of data between two computers 12 and 14 connected via a secure storage device 16 (Figure 1, col. 4, lines 4-40), and Kenworthy merely discloses an internal network node having a dedicated firewall, wherein the network has an attached PC client 114B. No portable devices are disclosed or suggested.

Furthermore, as discussed above, Friday does not disclose forming a connection via a first and second firewall as recited in claim 1 (Friday teaches a firewall free system). While Kenworthy does disclose a single firewall, it does not disclose a second firewall as recited in claim 1. Accordingly, claim 1 is allowable. Claims 13, 17, 25, 28, 32, 36 and 38 recite similar features to those discussed above and are therefore also allowable.

The remaining independent claims, 7, 15, 21 and 34, recite a portable device “establishing a connection with said image forming data transmission device via a public network, a public network authenticating server connected to said first internal network, and said first internal network.” Neither Friday nor Kenworthy discloses the use of a public network to connect a portable device and an image forming data transmission device as recited in these claims, nor has the Examiner suggested where in the references such a disclosure may be found. Accordingly, claims 7, 15, 21 and 34 are allowable.

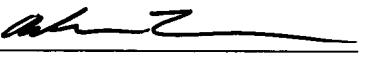
Claims 2-6, 8-12, 14, 16-20, 22-24, 26, 27 and 29-31 depend from allowable claims and are therefore allowable due at least to their respective dependencies.

Applicants solicit an early response allowing the claims.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief, including extensions of time, and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing Attorney Docket No. 325772028100.

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